

****DRAFT****

Substantial Amendment to City of Rockford's 2011 Consolidated Plan Annual Action Plan

Implementation of the Emergency Solutions Grant (ESG)

Overview

The Emergency Solutions Grants program (ESG) is administered by the City of Rockford to help nonprofit organizations, including community and faith-based organizations; provide emergency overnight and day shelter; offer supportive services for homeless families and individuals; and implement effective homeless prevention and rapid re-housing initiatives within the local continuum of care. Prior to the reauthorization of HUD McKinney-Vento programs (HEARTH Act), the program was known as the Emergency Shelter Grants program. Among other changes, the HEARTH act amends the program name to Emergency *Solutions*; updates the definition of homelessness; requires increased coordination and collaboration between the ESG Grantee and local Continuum of Care; requires adoption of performance and outcome measures; and encourages Grantees to build on successful homelessness prevention and rapid re-housing strategies developed through the ARRA-funded Homelessness Prevention and Rapid Re-housing Program (HPRP).

Increased Coordination

The City of Rockford continues to coordinate with partners in the Mayors' Task Force on Homelessness and external stakeholders to ensure that ESG's enhanced homelessness prevention and rehousing role is part of an integrated, local strategy to ending homelessness and improving housing and stability outcomes for families and individuals. City of Rockford helps to facilitate many informal working relationships between stakeholders and has taken the following steps in anticipation of the HEARTH Act to improve coordination.

- Staff from the City of Rockford meets regularly with the Mayors' Task Force on Homelessness.
- The City of Rockford has begun sharing additional sub-recipient/sponsor information relating to the development of performance measures and actual outcomes for both the ESG, Supportive Housing Program (SHP), and Shelter Plus Care Program. All information that is relayed to the City is now sent to the sub grantees and/or task force members via procedure letters sent out by email.
- The federal Department of Housing and Urban Development (HUD) presented to the local community on changes in programming and policies due to the HEARTH Act on March 14, 2012.

Match Requirement

HUD allocated \$52,064 in additional federal funds to be used for the Emergency Solutions Grant Program in 2012. These funds must be matched 100% by providers of the Emergency Solutions Grant Program.

Proposed Activities and Overall Budget

City of Rockford does not intend to reprogram any portion of the initial (phase I) FFY 2011 Emergency Shelter Grant award. Phase II Emergency *Solutions* Grant funds in the amount of \$52,064 will be allocated to Rapid Re-housing; Homelessness Prevention; and Administration of the ESG program.

(For a detailed budget of planned activities and funding levels accounting for entire first and second allocations, please refer to the Budget Table in the appendix.)

Proposed New Activities for PHASE II ESG funding

1. Rapid Re-housing - Housing Relocation and Stabilization Services.

Corresponding priority needs from Annual Action Plan:

1. Reaching out to homeless persons
2. Helping homeless persons transition to permanent housing

Concise description of activity:

Financial Assistance

- Moving costs
- Security deposit / last month's rent
- Utility deposit / Utility payments

Services

- Housing stability case management (both before and/or after lease-up)
- Housing search / placement
- Credit repair / budgeting / money management
- Landlord-Tenant Mediation

Corresponding standard objective and outcome categories:

Decent Housing / Sustainability (DH3)

2. Homelessness Prevention - Housing Relocation and Stabilization Services.

Corresponding priority needs from recipient's Annual Action Plan:

1. Helping low income families avoid becoming homeless

Concise description of activity:

Financial Assistance

- Moving costs
- Security deposit / last month's rent
- Utility deposit / Utility payments

Services

- Housing stability case management (both before and/or after lease-up)
- Housing search / placement
- Credit repair / budgeting / money management
- Landlord-Tenant Mediation

Corresponding standard objective and outcome categories:

Decent Housing / Sustainability (DH3)

Start date and completion date:

Emergency Solutions Grant FFY 2011 Phase II funding must be fully expended

within 24 months from the date HUD signs the amendment. At this time, the City of Rockford anticipates that at least 75% of phase II ESG funds will be expended in SFY 2013 (July 1, 2012 through June 30, 2013) and 100% of funds will be expended by March 1, 2014.

Rationale for Priorities

City of Rockford has chosen to prioritize phase II ESG funds for Homeless Prevention and Rapid Re-housing. The decision to allocate \$53---- in this category is based on an analysis of data and lessons learned from HUD's HPRP program; reports released by policy experts such as the National Alliance to End Homelessness; and from an acknowledgement that homelessness is inherently traumatic for families and individuals and that reducing the duration of homelessness for families and individuals is the most humane, efficient and effective strategy for reducing homelessness, preventing chronic homelessness, and avoiding more costly interventions in the future.

In both categories, City of Rockford has elected to allocate funding to Housing Relocation and Stabilization Services. This helps to fill a critical gap in case management, and provides maximum flexibility for local sub-recipient providers to respond to the individual needs of homeless households with funding for activities such as rental assistance, security deposits and housing search.

Standards for Provision of ESG Assistance

Eligibility for Services:

To be eligible for ESG assistance, all households must meet the *definition of homelessness posted by HUD on November 15, 2011*. That definition is as follows:

(1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

(i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

(ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or

(iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;

(2) An individual or family who will imminently lose their primary nighttime residence, provided that:

(i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;

(ii) No subsequent residence has been identified; and

(iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;

(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

(i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);

(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;

(iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and

(iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or

(4) Any individual or family who:

(i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;

(ii) Has no other residence; and

(iii) Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

Specific Eligibility for Rapid Re-Housing

Rapid Re-Housing is available to those who are literally homeless, per the November 15, 2011 HUD definition.

Rapid Re-Housing can be used to help a homeless individual or family move into permanent housing and achieve housing stability. Eligible Rapid Re-Housing activities will include Housing Relocation and Stabilization Services.

Specific Eligibility for Homelessness Prevention

Homelessness Prevention Services are available only to persons below 30% of Area Median Income who are homeless or at risk of becoming homeless.

Homelessness Prevention Services may be used to prevent an individual or family from becoming homeless or to help an individual or family regain stability in current housing or other permanent housing. Eligible Homelessness Prevention activities will include Housing Relocation and Stabilization Services.

Allowable activities under rapid re-housing and homelessness prevention components:

***Financial Assistance**

- Moving costs
- Security deposit / last month's rent
- Utility deposit / Utility payments

*No financial assistance may be provided to a household for a purpose and time period supported by another public source.

Services

- Housing stability case management (both before and/or after lease-up)
- Housing search / placement
- Credit repair / budgeting / money management
- Landlord-Tenant Mediation

Local Coordination of Shelter and Services

At the local level, emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers are coordinated through the Rockford/Boone and Winnebago Continuum of Care which covers two counties in northern Illinois. This continuum has developed working groups, or interagency teams to ensure coordination of services for homeless and at-risk households.

Prioritization and Further Eligibility for Households

Prioritization of eligible families for both rapid re-housing and homelessness prevention services will be determined by the local non-profit ESG sub-recipient using a risk-based assessment at the time of initial program intake and screening.

Prevention

Only persons who are below 30% of Area Median Income, and who are at imminent risk of homelessness according to part (2) of the November 15, 2011 definition, and who otherwise lack adequate resources to prevent homelessness will be eligible for ESG homelessness prevention assistance. Non-Profit sub-recipients providing such assistance must document household income information and proof that homelessness is imminent, and maintain this documentation along with client IDIS data. No financial assistance may be provided to a household for a purpose and time period supported by another public source.

Re-Housing

Only persons who are literally homeless per the November 15, 2011 definition will be eligible for ESG homelessness prevention assistance. Non-Profit sub-recipients providing this assistance must document that the household is homeless and maintain this documentation along with client IDIS data. No financial assistance may be provided to a household for a purpose and time period supported by another public source.

Special Guidance on Case Management

Sub-recipients using ESG funding to fund Case Management activities must understand and agree to the following special guidance.

Clarifying Case Management vs. Intake/Screening

While acknowledging that case management should remain flexible to best serve the individual needs of households, the following defines basic expectations as to what is provided. This is preceded by a definition of Intake/Screening, another essential

function for programs serving the homeless.

Intake/Screening: *To provide coordination at the program or community level; and direct financial assistance where appropriate.*

- Record base household information to determine immediate need, and eligibility for other assistance.
- Assess if a household's needs can be met with financial assistance alone (such as back rent, mortgage arrearage, security deposit), or if more intensive supports are required.
- Provide financial assistance where appropriate.
- Determine what initial referral may be appropriate (case management, shelter, etc.).
- Follow-up on initial referral to prevent a household from "falling through the cracks."

Case Management: *To provide coordination for the household; to provide more intensive interaction and services for clients deemed unlikely to resolve their housing crisis with short-term financial assistance alone.*

- Work closely with the household to acquire and maintain stable housing which is affordable to them.
- Determine (in consultation with household and other community partners, if applicable) who shall be the lead case manager for the household.
- Work with participants to develop a housing plan, set goals, and help participants stay on course.
- Employ best practices to help the household identify its strengths and opportunities, as well as underlying issues which may have led to homelessness, or could undermine success if not addressed.
- Provide information and encouragement for the household (or members of the household) to avail themselves of other appropriate services or take appropriate action to address barriers.
- Maintain a relationship with household, identifying the appropriate level of support without creating over-dependence. This includes providing -- when appropriate -- follow-up case management for higher-risk families after they have moved into permanent housing.

Process for Making Sub-Awards (for all Phase II ESG funding)

One or more grants will be awarded by the City of Rockford to nonprofits whose purpose is to shelter, serve, and rehouse the homeless. Applications for ESG funding will be evaluated by the City of Rockford Human Services Department in conjunction with a Continuum committee. Eligible applicants are municipalities and approved nonprofits including community and faith-based organizations that;

1. Provide evidence of a match for the match requirement in the application.

Selection of applicants for funding will be made based on the following:

1. Meeting of criteria as outlined in this document and detailed in the Request for Proposal (RFP).
2. The applicant's history of providing effective rapid rehousing or prevention services to the homeless, and of successfully operating performance-based grant-funded programs.

3. The applicant's effective coordination with organizations in their local "continuum of care," to address identified gaps in services for the homeless and improve outcomes for participants.
4. The applicant's ability to transition homeless participants or shelter residents to permanent or transitional housing, and/or prevent homelessness for families and individuals who are at risk.

Grant funds may not be used for the following:

- Acquisition/Mortgage costs;
- Rehabilitation services such as preparation of work specifications, loan processing or inspections.
- Renovation, rehabilitation or conversion of buildings

Additional guidance on eligible and ineligible uses of ESG funds are contained in the Department of Housing and Urban Development's ESG program guidelines, and in grant agreements between the City of Rockford and its sub-recipients.

Homeless Participation Requirement

The Sub Grantee is subject to § 576.405(a) and must demonstrate homeless participation in a decision making committee or board.

Performance Standards

Beyond traditional output measures -- such as the number of households receiving homelessness prevention assistance -- the Department of Human Services has adopted performance-based contracting and the following outcome measures, indicators and targets, consistent with the goal of ending homelessness as shown below:

Homelessness Prevention and Rapid Re-Housing

- *At least 50% of households will have their housing stabilized or be safely rehoused within 28 days. **AND** 70% of the above households will continue to be in stable housing at least 90 days following assistance.*
- *Sub-recipients using ESGP Prevention funds to place families in short-term emergency motels will ensure that the average motel stay does not exceed 10 days, **AND** that 90% of households placed in motels meet with a case manager within 3 days.*

Housing Case Management

- *At least 90% of homeless households referred for case management will meet with a case manager or housing advocate within 3 days of the referral.*
- *Within 90 days of referral, at least 50% of households will have at least 1 adult in the household who is employed **OR** has enrolled in an educational or training program, **OR** has qualified for income benefits such as TANF, SSI or G.A.*
- *Within 120 days of referral, at least 70% of households receiving case management from the Grantee will be stabilized in transitional or permanent housing. **AND** At least 70% of those households will remain stably housed for at least 90 days.*

To establish baseline data, sub-recipients will report on the number of new residents, the number of residents exiting the program, and the average length of stay.

Sub-recipients shall also submit a quarterly "HMIS HPRP report" from the HMIS database. For the purposes of this grant, a "safe or complete exit" shall be defined as one of the following: College, friends, home with family or staying with relatives, independent living, Job Corps, military, residential treatment/rehab.

In the event that a sub-recipient's performance falls below 75% of a stated target, the sub-recipient, in conjunction with the City of Rockford will develop a performance improvement plan. Continued failure to meet performance measures may result in loss of fees or cancellation of the grant agreement.

Substantial Amendment Timeline

April

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| April 9 | Review amendment with Homeless Task Force committee |
| April 9 | Public Comment Period for ESG Amendment begins |
| April 19 | Public Hearing Meeting at 3:00 pm/Homeless Task Force |

May

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| May 14 | Review comments with Homeless Task Force committee and make final changes to amendment |
| May 15 | Deadline for Submission of ESG Amendment to HUD |

June

Prepare Agreement for additional ESG Allocation (after approval of amendment by HUD)

This Timeline current as of 4/4/12

FY 2011 Detailed Budget Table

First Allocation		\$92,558	FY 2011		
Second Allocation		\$52,064	Emergency Shelter Grants/ Emergency Solutions Grant		
Grant Amount		\$144,622	Program Allocations		
			First Allocation	Second allocation	Total FY 2011
	Eligible Activities	Activity Amount	Reprogrammed amount	Activity Amount	
Emergency Shelter Grants Program	Homeless Assistance	\$61,446.05	\$0		\$61,446.05
	<i>Rehab/conversion</i>	\$0	\$0		\$0
	<i>Operations</i>	\$61,446.05	\$0		\$61,446.05
	<i>Essential Services</i>	\$0	\$0		\$0
	Homeless Prevention	\$26,483.95	\$0		\$26,483.95
	Administration	\$4,628.00	\$0		\$4,628.00
	Emergency Shelter Grants subtotal	\$92,558.00	\$0		\$92,558.00
Emergency Solutions Grant Subtotal	Emergency Shelter			\$0	\$0
	<i>Renovation</i>			\$0	\$0
	<i>Operation</i>			\$0	\$0
	<i>Essential Services</i>			\$0	\$0
	<i>URA Assistance</i>			\$0	\$0
	Street Outreach			\$0	\$0
	HMIS			\$0	\$0
	Rapid Rehousing			\$28,897.00	\$28,897.00
	Housing Relocation & Stabilization			\$4,334.00	\$4,334.00
	Tenant Based Rental Assistance			\$24,563.00	\$24,563.00
	Project Based Rental Assistance			\$0	\$0
	Homeless Prevention			\$16,948.00	\$16,948.00
	Housing Relocation & Stabilization			\$2,089.00	\$2,089.00
	Tenant Based Rental Assistance			\$14,700.00	\$14,700.00
	Project Based Rental Assistance			\$0	\$0
	Administration			\$6,219.00	\$6,219.00
	Emergency Solutions Grant Subtotal			\$52,064.00	\$52,064.00